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May 8, 1998

A. Richard Metzger  
Chief, Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: NSD File No. L-98-27, CC Docket No. 95-116  
Order, DA 98-614 (March 31, 1998)  
Long-term Database Method of Number Portability (LNP)

Dear Mr. Metzger:

Pursuant to paragraphs 41 and 42 of the referenced order, BellSouth herewith files its May 8, 1998 report on the progress it and Lockheed Martin have made and are making with respect to BellSouth's interface with the Lockheed Martin Number Portability Administration Center regional Service Management System (SMS) database (NPAC). BellSouth also reports on its progress on updating BellSouth's SMS interface with its internal systems, including its AIN SMS, Service Order Control System (SOCS), Product and Services Information Management System (PSIMS), and its Customer Revenue Information Systems (CRIS). Finally, BellSouth refiles with this report its architectural arrangements for number porting.

I. BellSouth's Interface with the Lockheed Martin NPAC

BellSouth's individual downstream database, as contemplated by the Commission's rules, 47 C.F.R. § 52.25(i), is the "BellSouth LNP Gateway(G/W) SMS."<sup>1</sup> The BellSouth LNP Gateway SMS operates both as an integrated interface between the Lockheed Martin NPAC and over forty (40) downstream operations support systems (OSS) within BellSouth.<sup>2</sup> On March 2, 1998, BellSouth filed its Petition to Extend Time for Implementation for all five of the Commission's LNP implementation phases. With respect to Phase I, BellSouth requested an extension of the March 31, 1998 Phase I LNP implementation deadline until November 15, 1998.

<sup>1</sup> Letter from Theodore R. Kingsley, General Attorney for BellSouth Corporation, to Geraldine A. Matise, Chief Network Services Division, FCC, filed March 25, 1998, at 2 (BellSouth Letter).

<sup>2</sup> *Id.*

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The November 15, 1998, revised implementation date was based upon the data available to BellSouth as of the date of its Extension Petition, filed three weeks after the contract between the former Local Number Portability Administrator (LNPA) for the Southeast Number Portability Administration Center, Perot Systems, and Southeast Number Portability Administration Company, L.L.C., was terminated. The fundamental assumption underlying the data was that BellSouth would have to engineer and develop software for the majority of change orders associated with the North American Numbering Council (NANC) R1.8 release in order to certify the comparability of its interface with the new Lockheed Martin NPAC. BellSouth had been engineering and developing interface software for the Perot Systems NPAC which was scheduled to be at NANC release version R1.1 until the former contract was terminated on February 10, 1998. The difference, or "delta," between the Perot Systems NPAC built to NANC R.1, and the Lockheed Martin NPAC, built to NANC R1.8, and specifically the software development efforts required to eliminate this difference, is the basis for BellSouth's pending request for extension.

As of March 2, 1998, the earliest interface software release in which BellSouth could have incorporated the necessary NANC R1.8 modifications was BellSouth LNP G/W R1.7, which would include the requisite new ordering and provisioning functionality. LNP G/W R1.7 was designated as the production software to be used for NPAC certification testing, industry end-to-end testing and turn-up of LNP database service in Atlanta. Based on an engineering evaluation of the NANC change orders and an estimate of the time necessary to develop the associated software, to conduct a rigorous internal test process necessary for call processing software and to conduct certification testing with a Lockheed Martin/ESI/Stratus platform for which BellSouth had never attempted an electronic association, BellSouth concluded that it could not reasonably deploy LNP in the Atlanta MSA prior to October 1, 1998 and could not complete deployment until November 15.

A. Progress Made

On March 31, 1998, the Bureau granted a waiver to BellSouth of the Phase I implementation date until August 31, 1998, a full ten weeks less than the amount of time requested by BellSouth. This new deadline required BellSouth to thoroughly reexamine its March 2, 1998 plan of record. In so doing, BellSouth determined that it must develop interface software functionality that would enable BellSouth to certify the compatibility of its interface with the Lockheed Martin NPAC in time to begin industry end-to-end testing by July 15, 1998. This is because BellSouth is required by state regulators to perform thorough testing of new services, essentially for thirty days (the equivalent of one billing cycle). By beginning a 30-day end-to-end testing period on July 15, 1998,

end-to-end testing could be completed on August 15, 1998. BellSouth would then have 14 days to implement LNP in the Atlanta MSA, a 30 day reduction from its original plan.

BellSouth also determined, however, that it would be impossible to develop the LNP G/W R1.7 software in time to certify with the Lockheed Martin NPAC prior to July 15, 1998. BellSouth therefore had to reduce its NANC R1.8 software development effort and build reduced functionality into an earlier software release than its own LNP G/W R1.7. BellSouth identified three areas of interface functionality that were candidates for deferred development because they did not cause significant operations impacts on systems and center personnel: (1) system audit functionality; (2) filtering functionality; and (3) NPA Split functionality.

B. Steps Taken

In order to ensure a thorough and objective re-evaluation of the NANC change orders, BellSouth contracted for the services of Telecom Software Enterprises (TSE) in evaluating the areas of development where functionality could be initially reduced without impacting operations. TSE was founded by personnel who led the development effort in the software company that developed the Lockheed Martin NPAC software. TSE's assistance was critical in assisting BellSouth in identifying and prioritizing the functionality that, in TSE's professional judgment, was absolutely necessary to gain NPAC certification prior to July 15, 1998. From this effort, BellSouth, TSE and Lockheed Martin concurred on the absolute minimal subset of NANC 1.8 functionality which would allow BellSouth to pass NPAC certification testing. In addition, TSE provided BellSouth with expertise in the area of clarification of procedures and definitions associated with Lockheed Martin NPAC test suites.<sup>3</sup>

Reaching a final definition of BellSouth LNP G/W R1.6 requirements, including the minimal requisite subset of NANC R1.8 functionality, allowed BellSouth to develop a final view of systems engineering resources and software development resources required. The revised plan required a minimum of 95 working days for engineering analysis, design and systems requirements, and over 140 days of software development and quality assurance testing. These projected human resource requirements do not include additional work associated with peripheral systems and network centers and operations involved with systems integration testing.

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<sup>3</sup> A test suite is a group of test cases in which software is tested according to various functional groups.

Once the minimal subset of NANC R1.8 functionality was identified, BellSouth Applied Technologies (BAT), developer of the LNP G/W interface software, undertook to determine whether this functionality could be built into LNP G/W R1.5 software that has just recently been released from internal quality assurance testing. The critical test of LNP G/W R1.5 quality had to be gleaned from actual test results with the Lockheed Martin NPAC. Initially, BellSouth tested its LNP G/W R1.1 NPAC interface software, developed for use with the Perot Systems NPAC, with Lockheed Martin's 1.1 software to determine if the BellSouth platform could even communicate with the Lockheed Martin platform.<sup>4</sup> Results from interoperability testing over a dial-up T1 facility to the DSET laboratory in New Jersey exceeded expectations in that 76 of 92 test suites passed and no critical software bugs were identified. Even though this early interface software is not capable of deployment in the field, this testing provided an empirical demonstration that the communications interface functionality of the BellSouth LNP Gateway SMS was and is compatible with the Lockheed Martin NPAC platform. These test results were critical because if had they been less successful, fundamental changes to the platform communication software and, consequently, significant additional software development and testing time, would have been required.

BellSouth proceeded with LNP G/W R1.5 testing over a dedicated T1 interface facility to the Lockheed Martin remote test site in Tarrytown, New York on April 11, 1998. As of April 30, 1998, BellSouth had executed 78 test suites, passed 65, failed eight, and have five under current analysis.

Based on these results it appears that the LNP G/W R1.5 is stable and of high quality. BellSouth believes that a minimal subset of NANC R1.8 functionality necessary to pass certification testing with the Lockheed Martin NPAC can be built into the current LNP G/W R1.5 to create LNP G/W R1.6. Even though this release will not contain all of the additional ordering, provisioning and associated functionality that BellSouth had hoped to provide to its local exchange and competitive local exchange carrier customers, it appears that the interface software will have sufficient stability to allow industry end-to-end testing to begin on July 15, 1998, in time to deploy LNP in the Atlanta MSA by August 31, 1998.

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<sup>4</sup> BellSouth Letter at 4-5.

As a result of the foregoing data analysis, which indicated that BellSouth's implementation intervals filed on March 2, 1998 could be shortened, and pursuant to its earlier commitments to the Bureau,<sup>5</sup> BellSouth filed a Supplement to Petition to Extend Time for Network Implementation on May 1, 1998, a copy of which is attached hereto and the text of which is incorporated herein. By its Supplement, BellSouth committed to implement LNP in Atlanta pursuant to the August 31, 1998 date set forth in the order, and to implement succeeding phases in 30-day intervals thereafter with the result that all five phases will be completed by December 31, 1998, the Commission's original deadline for Phase V metropolitan statistical areas (MSAs).

## II. BellSouth's SMS Interface with its Internal OSS

As stated above, the BellSouth LNP Gateway SMS operates both as an integrated interface between the Lockheed Martin NPAC and over forty downstream operations support systems (OSS) within BellSouth.<sup>6</sup> If the interoperability test results between the BellSouth LNP G/W R1.1 software and Lockheed Martin-developed NANC 1.1 software, conducted over DSET's remote facilities, had indicated that fundamental changes to the platform communication software were required, or if BellSouth had contracted its interface development efforts to third parties, the updating of BellSouth's LNP Gateway SMS interface would have had a tremendous impact on its internal OSS. Because BAT was able to stay the course on software interface development, and due to the success of the early test suites, the software development efforts described above have had no negative downstream effects on the SOCS, PSIMS and CRIS OSS. Early testing with the AIN SMS software has similarly yielded very positive results and indicates that the necessary development for NANC 1.8 will be included in BellSouth's AIN SMS Release 12, scheduled for release on July 1, 1998.

## III. Detailed Work Plan for Next Steps

BellSouth attaches to this report an LNP Critical Path Milestone chart for March-September, 1998; an LNP Critical Path Milestone chart for September 1998-January 1999; an LNP Gateway SMS Schedule current as of April 28, 1998 which tracks the duration, start, finish and status of 49 separate tasks related to development of the Lockheed Martin NPAC interface in order to allow LNP implementation in Atlanta by August 31, 1998; and a separate schedule for its LNP AIN SMS work effort identifying the duration, start, finish and status of 12 separate tasks related to updating the NPAC interface with its AIN SMS.

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<sup>5</sup> *Id.* at 4.

<sup>6</sup> *Id.* at 2.

IV. Description of BellSouth's Architectural Arrangements for Number Porting

In its March 2, 1998 Petition for Extension, a diagram of BellSouth's architectural arrangements for number porting was attached to the affidavit of Douglas W. McDougal, entitled "LNP System Components." Mr. McDougal described this architecture in further detail during our March 20, 1998 ex parte with Bureau Staff. This architecture has not changed, and for the convenience of the Bureau, another copy of the diagram is attached to this report in compliance with paragraph 42 of the March 31, 1998 Waiver Order.

V. Contingencies

BellSouth is confident that its cooperative efforts with Lockheed Martin and TSE, and its revised NPAC interface development plan in light of the August 31, 1998 waiver grant for Atlanta, have enabled it to shorten its LNP implementation intervals as set forth in its May 1, 1998 Supplement to Petition to Extend Time for Network Implementation, and to withdraw its pending request for an extension of the Phase V implementation deadline. Nevertheless, some contingencies are ever present: the ability of the current LNPA to timely deliver an NPAC; the continued success of developmental interface software interoperability testing; and the availability of competent field forces to deploy LNP.<sup>7</sup> With these caveats, BellSouth is confident that it can proceed to timely implement LNP in Atlanta pursuant to the Bureau's March 31, 1998 order, and to complete LNP implementation region wide as set forth in its revised implementation schedule by December 31, 1998.

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<sup>7</sup> BellSouth's current collective bargaining agreement with the Communications Workers of America, the union representing these field forces, expires in August of this year.

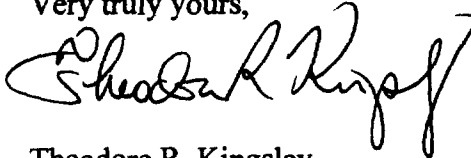
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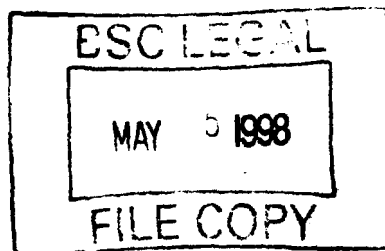
A copy of this status report is being mailed to all carriers who have filed requests for extension of time within the Southeast NPAC Region, as well as all those who commented on BellSouth's earlier filed Petition.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Theodore R. Kingsley', written in a cursive style.

Theodore R. Kingsley

cc: Geraldine A. Matisé  
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Marian R. Gordon  
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Doug McDougal  
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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

VOLUME #  
528

In the Matter of )

Telephone Number Portability )

NSD File No. L-98-27

CC Docket No. 95-116

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**SUPPLEMENT TO PETITION TO EXTEND TIME FOR**  
**NETWORK IMPLEMENTATION**

BellSouth Corporation,<sup>1</sup> on behalf of itself and each of its affiliated companies that are subject to Part 52, Section 52.23(a) of the Commission's Rules, 47 C.F.R. § 52.23(a) (BellSouth), hereby files this supplement to its March 2, 1998 petition to extend the time by which implementation of a long-term database method for number portability (LNP) in the BellSouth network will be completed in all MSAs within Phase I, II, III, V and V of the Commission's LNP implementation schedule within the Southeast Number Portability Administration Center (NPAC) Region 4. This supplement modifies the implementation schedule originally proposed by BellSouth on March 2, 1998 and is based on the August 31, 1998 implementation date for Atlanta established in the Common Carrier Bureau's March 31,

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<sup>1</sup> BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of, among other companies, BellSouth Telecommunications, Inc. (BST), a Bell operating company and local exchange carrier (LEC) that provides wireline telephone exchange service and exchange access service in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee ("NPAC Region 4" or the "Southeast Region"). BST and BSC have or may form alternative local exchange carrier (ALEC), and competitive local exchange carrier (CLEC) affiliates to serve customers within and outside the Southeast Region where BellSouth has not traditionally held a franchise to provide telephone service.



1998 Waiver Order<sup>2</sup> and BellSouth's progress in meeting the August 31, 1998 implementation date, which will be the subject of a May 8 status report to the Bureau as required by the terms of the Waiver Order. BellSouth provides further information in support of its pending request and requests that the Commission, in its next order, grant firm implementation dates for all remaining Phases in accordance with the modified implementation schedule proposed herein.

BellSouth has undertaken significant efforts to implement LNP in Atlanta by August 31, 1998. Based on these efforts, the amount of interface development work remaining and the requirements of orderly intercompany testing among multiple providers across multiple MSAs in multiple states in succeeding LNP Implementation Phases, BellSouth is proposing to implement the remaining Phases in roughly thirty (30) day intervals beginning September 1, 1998, so that all five Phases will be completed by the end of the Commission's original deployment schedule, December 31, 1998. Specifically, BellSouth herewith modifies its implementation schedule to complete Phase II MSAs by September 30, Phase III MSAs by October 31, Phase IV MSAs by November 30, and Phase V MSAs by December 31, 1998<sup>3</sup> assuming, of course, timely NPAC delivery:

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<sup>2</sup> *Telephone Number Portability Petitions for Extension of the Deployment Schedule for Long-Term Database Methods for Local Number Portability Phase I*, CC Docket No. 95-116, NSD File Nos. L-98-20, L-98-28, L-98-27, L-98-24, L-98-21, L-98-09, L-98-29, L-98-30, L-98-26, L-98-31, L-98-22, L-98-23, L-98-32, L-98-25, *Order* (rel. March 31, 1998).

<sup>3</sup> December 31, 1998 is the date the Commission originally established for completion of Phase V. However, BellSouth intends to complete implementation of Phase V MSAs on or about December 15, 1998, in light of the subsequent seasonal holidays.

<b>Phase I</b>	<b>Phase II</b>	<b>Phase III</b>	<b>Phase IV</b>	<b>Phase V</b>
Orig.: 182 days	Orig.: 135 days	Orig.: 91 days	Orig.: 92 days	Orig.: 92 days
10/1/97-3/31/98	1/1/98-5/15/98	4/1/98-6/30/98	7/1/98-9/30/98	10/1/98-12/31/98
Petition: 45 days	Pet'n.: 47 days	Pet'n.: 30 days	Pet'n.: 30 days	Pet'n.: 30 days
10/1/98-11/14/98	11/15/98-12/31/98	1/1/99-1/30/99	1/31/99-3/1/99	3/2/99-3/31/99
Waiver Order August 31, 1998	Supplement to Pet'n.: 9/30/98	Supplement to Pet.: 10/31/98	Supplement to Pet'n.: 11/30/98	Supplement to Pet'n.: 12/31/98
Atlanta	Miami Ft. Lauderdale Orlando Tampa	New Orleans Charlotte Greensboro Nashville	Memphis Louisville Jacksonville Raleigh W. Palm Beach Greenville	Birmingham Knoxville Baton Rouge Charleston Mobile Columbia

As BellSouth explained in its original petition, BST undertook substantial activities to meet the Commission's implementation schedule prior to requesting an extension of time for each affected switch within the Southeast Region. These activities included establishing an LNP using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Points (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the new master database of all ported numbers in the Southeast Region (the NPAC SMS database) which was to have been provided by the former Local Number Portability Administrator (LNPA), Perot Systems. On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C.

(Southeast LLC) terminated its contract with the former LNPA. Perot Systems. as a result of its failure to provide the NPAC SMS database, and substituted the current LNPA. Lockheed Martin.

BellSouth further advised the Bureau in its original petition that the new Lockheed Martin NPAC SMS database is a full seven (7) NANC LNP software specification releases beyond the NPAC SMS database that was to have been delivered by Perot Systems. and that this fundamental difference in NPACs interface specification will require BellSouth to engineer and develop significant software modifications to its NPAC interface, the BellSouth LNP Gateway Service Management System (LNP G/W). The Bureau determined that BellSouth satisfied the requirements of the Commission's rules with respect to demonstrating the need for an extension of the implementation date, and that it demonstrated unique circumstances that justify additional time it needs to implement LNP.<sup>4</sup> Nevertheless, the Commission did not grant BellSouth's request to extend the Phase I implementation deadline to November 14, 1998, but rather granted a waiver to BellSouth until August 31, 1998.

On the date of the Bureau's Waiver Order, BellSouth had completed all of its network implementation for LNP within the Atlanta MSA, and was then and is now querying in 100% of its switches. BellSouth has substantially completed network implementation within Phase II MSAs, is currently querying on 91% of all switches, and is on track to complete its network installation by May 15, 1998, the Commission's original deadline. With respect to Phase III MSAs, all service control points and related software have been installed. Querying has also begun in Phase III MSAs, and BellSouth remains on track to complete its internal network implementation efforts for Phases III, IV and V.

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<sup>4</sup> Waiver Order, para. 41.

With respect to its Lockheed Martin NPAC interface development efforts, BellSouth was driven by the August 31, 1998 date in the Waiver Order to arrive at a software solution that would permit certification with the Lockheed Martin NPAC in time to begin final industry end-to-end testing on July 15, 1998. BellSouth had previously targeted its internally developed LNP G/W software release R1.7 as the production release software for the Lockheed Martin NPAC interface that would have contained the necessary NANC 1.8 changes as well as additional ordering and provisioning functionality for competitive local exchange carriers. This target release, together with associated development efforts, was the keystone to BellSouth requesting an implementation date of November 14, 1998 for Atlanta.

It being impossible to have LNP G/W R1.7 ready by July 15, 1998, BellSouth sought to evaluate whether or not an absolutely minimal subset of NANC 1.8 functionality, which would enable NPAC certification, could be built into an earlier version of its interface software, LNP G/W R1.5. BellSouth contracted with outside consultants who were individually and personally involved in the original development of the Lockheed Martin NPAC software in order to maximize the probability of success of this engineering challenge. With the help of these consultants, Telecommunications Software Enterprises, BellSouth was able to refine its development and testing intervals to the extent that BellSouth believes that it can develop and load a production version of LNP G/W R1.6 by July 15, 1998 in order to conduct industry testing.

Based on the success of interoperability testing of the LNP G/W R1.1 platform over dial-up facilities, BellSouth began turn-up testing of LNP G/W R1.5 over dedicated facilities on April 11, 1998. To date, 40 out of 45 test suites have passed, and BellSouth remains guardedly optimistic that it can complete development of R1.6 with the minimal subset of NANC 1.8

change orders necessary to certify to the Lockheed Martin NPAC shortly, with testing to begin in two weeks. Nevertheless, additional interface software functionality remains to be developed, and BellSouth's modified implementation schedule represents the minimum time necessary to implement LNP in the remaining four phases after August 31 in light of this additional development and the need for rigorous intercompany testing.

Intercompany testing for all phases of number portability is being planned within the Southeast NPAC Region including multiple tests between pairs of service providers. Testing includes the ordering process (sending porting requests between service providers, issuing service orders), provisioning process, (working service orders, updating downstream systems, notifying NPAC of completion, receiving broadcast information from the NPAC, processing broadcast information through the local service management systems to the service control point databases) and call completion (multiple test call both to and from newly ported numbers). Several rounds of tests will be performed; and, in some instances, it is necessary to test serially.

As stated above, thirty days is a minimum interval necessary to accommodate the requirements of intercompany testing. BellSouth's modified schedule takes this into account and is the minimum time needed to accommodate responsible intercompany testing as well as the continuing interface software development efforts, including development of NPA split functionality. Within the Southeast Region, Phase I contains one MSA within one state. However, Phase II contains multiple test locations because there are four MSAs within a single state. Phase III is even more complicated because there are three different states involved, and one state has two MSAs, while Phase V presents more challenges as six MSAs are distributed across five different states. Multiple service provider testing participants have been identified in these locations, and it is reasonable to expect that as the time for LNP implementation

approaches, more carriers will need to participate in testing. Phase V contains the Baton Rouge MSA which is undergoing an area code split affecting all 17 of the switches in the Baton Rouge MSA earlier identified in BellSouth's March 2, petition. Three of the 47 New Orleans (Phase III) MSA switches identified in the March 2, 1998 filing are affected by the Baton Rouge split, and BellSouth's modified schedule allows minimum sufficient time to accommodate full LNP capability in these three switches.<sup>5</sup>

Finally, BellSouth urges the Commission to act on BellSouth's earlier filed petition as a whole, and grant its revised implementation schedule in its entirety, rather than respond by issuing piecemeal orders. BellSouth has already satisfied its burden of demonstrating the requirements necessary to achieve an extension of time.<sup>6</sup> BellSouth has undertaken an ambitious, focused and concentrated customized interface development effort in light of the Waiver Order's August 31, 1998 implementation deadline for Atlanta. BellSouth has revised its implementation schedule to implement LNP in all remaining phases in a manner that is consistent with the Waiver Order, responsible network engineering and which ultimately complies with Commission's original deployment schedule for final completion of all Phases by December 31, 1998. BellSouth's planning efforts are clouded by the uncertainty surrounding the timing and ultimate determinations arising out of the Bureau's apparent intent to react to BellSouth's

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<sup>5</sup> Convent CNVNLAMADSO; Lutcher LTCHLAMADSO; and Vacherie VCHRLAMADSO.

<sup>6</sup> Waiver Order, para. 41.

pending petition incrementally by phase. With the certainty of a single resolution for all phases. BellSouth can focus its entire efforts on implementing LNP within the Southeast NPAC Region.

### **CONCLUSION**

Having previously found that BellSouth's March 2, 1998 Request For Extension of Time complies fully with the Commission's requirements therefor, and in light of the modifications to its original implementation schedule proposed herein based upon the determinations of the March 31 Waiver Order, the Commission's original implementation schedule, BellSouth's continuing NPAC interface development efforts and the requirements for responsible intercompany testing in all phases, particularly multi-state, multi-MSA, multi-carrier environments and, good cause being shown, the Commission should grant an extension of the Commission's LNP implementation schedule and a waiver for each Phase in the Southeast NPAC Region as follows: Phase I (August 31, 1998), Phase II (September 30, 1998), Phase III

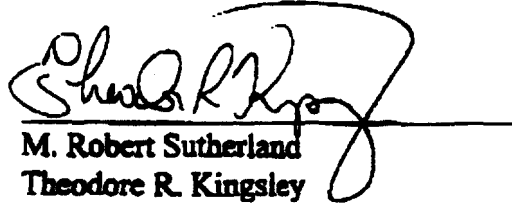
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<sup>7</sup> Although BellSouth requests that that the Bureau rule on BellSouth's remaining extensions requests at one time, and desires this request be granted in its next order addressing BellSouth's pending request for extension of Phase II, BellSouth does not intend that the grant of this request relieve BellSouth from the status report obligations imposed by the Bureau upon BellSouth in its March 31, 1998 Waiver Order.

(October 31, 1998), and Phase IV (November 30, 1998). BellSouth withdraws its request for an extension of the implementation date for Phase V.

Respectfully submitted,

BELLSOUTH CORPORATION



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Date: May 1, 1998




## **CERTIFICATE OF SERVICE**

I do hereby certify that I have this 1st day of May, 1998, served all parties to this action with a copy of the foregoing PETITION FOR WAIVER by placing a true and correct copy of same in the United States Mail, postage prepaid, addressed to the parties listed hereinbelow.

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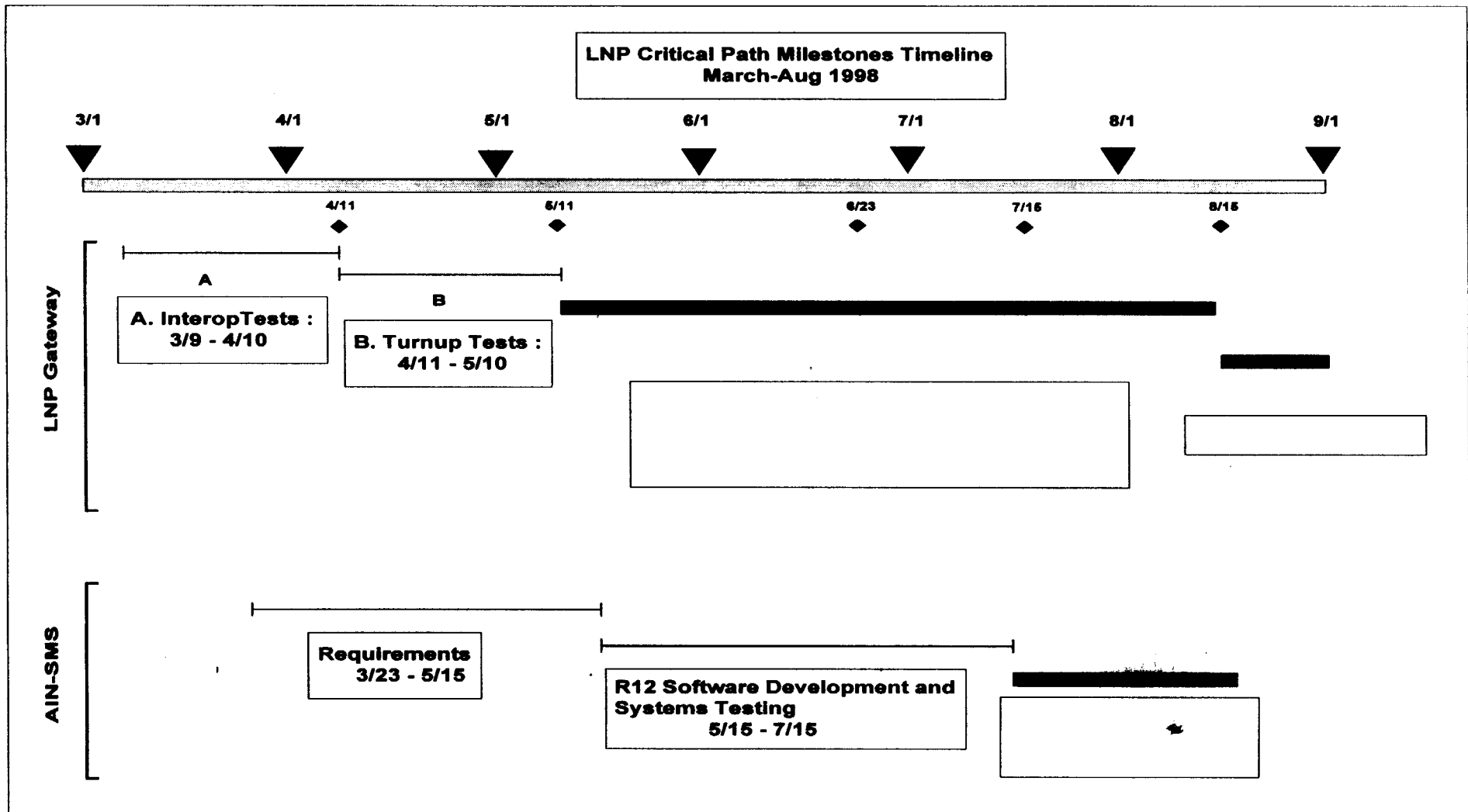
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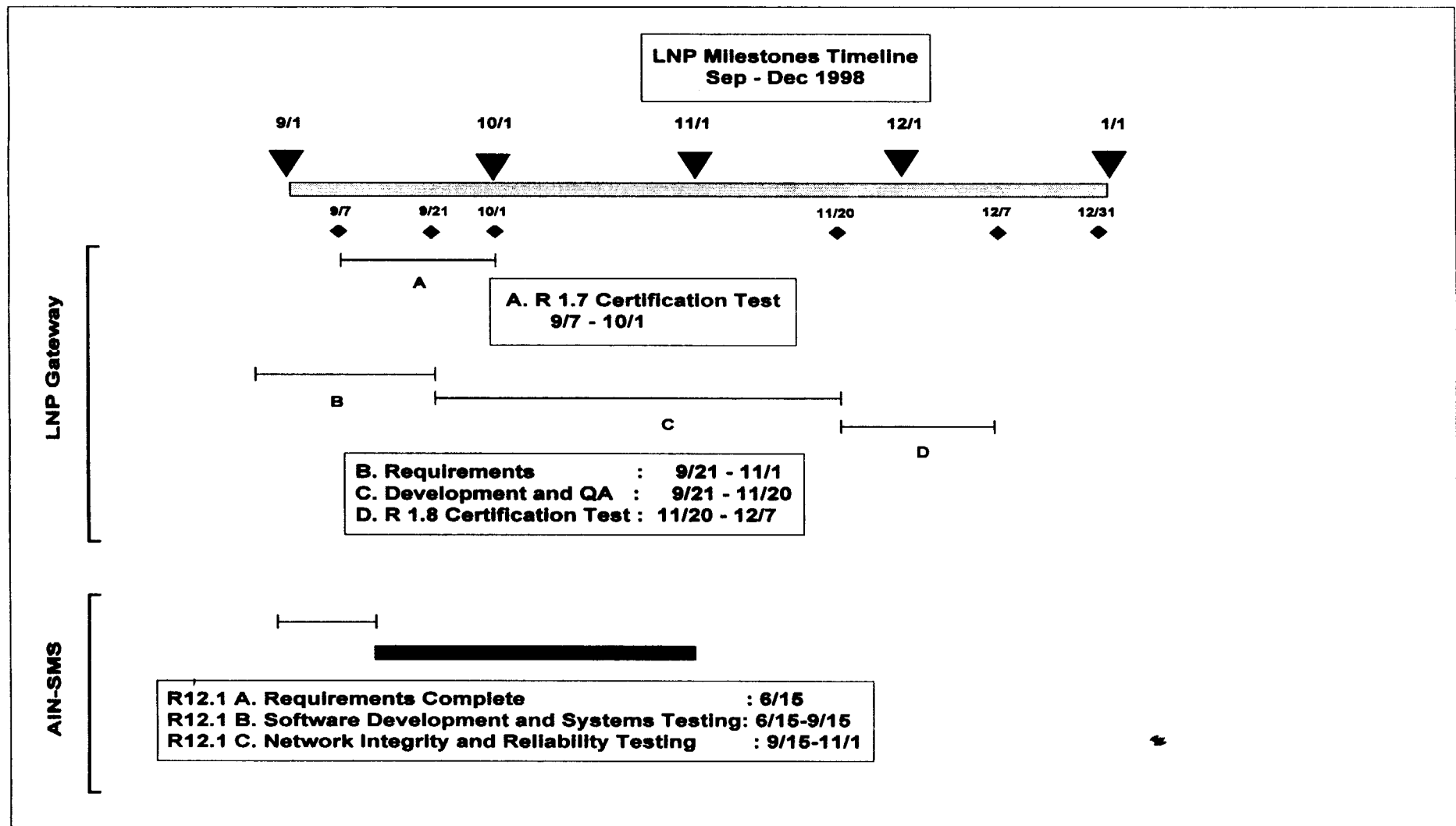
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Washington, D.C. 20008

## ➤ Critical Path Milestones, 3-98 to 9-98













## ➤ Critical Path Milestones, 9-98 to 1-99



**LNP Gateway SMS Schedule as of 4-28-98**

ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998						
					Feb	Mar	Apr	May	Jun	Jul	Aug					
1	Summary Release Schedule	143 d	Wed 2/11	Mon 8/31												
2	Sign Contract with vendor	1 d	Fri 2/13	Fri 2/13	100%											
3	Requirements	19 d	Wed 2/11	Mon 3/9	100%											
4	Complete NANC1.1 to NANC1.8 upgrade requirements	14 d	Wed 2/11	Mon 3/2	100%											
5	Approve NANC1.1 to NANC1.8 upgrade requirements	5 d	Tue 3/3	Mon 3/9	100%											
6	Network and Communications	31 d	Mon 2/16	Mon 3/30	100%											
ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998			Qtr 4, 1998			Qtr
					Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
7	Set up test system for dial-up testing to DSET	10d	Mon 2/23	Fri 3/6	100%											
8	Install T1 lines to Lockheed	29d	Mon 2/16	Thu 3/26	100%											
9	Test Connectivity to Chicago NPAC with T1	2d	Fri 3/27	Mon 3/30	100%											
10	Development (includes QA)	60d	Mon 3/2	Fri 5/22	74%											
11	Release 1.5 - LNP Gateway modifications to support GDMO recompilation changes only for	27d	Mon 3/2	Tue 4/7	100%											

ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998	
					Feb	Mar	Apr	May	Jun	Jul	Aug
12	Development and Unit Test of Release 1.6 - Implement NANC 1.8 Change Orders in LNP Gateway	24 d	Mon 3/16	Thu 4/16			100%				
13	Code Freeze of Release 1.6	0 d	Thu 4/16	Thu 4/16			100%				
14	QA and System test of Release 1.6	17 d	Fri 4/17	Mon 5/11			50%				
15	Development and Unit Test of Release 1.6.1 - Maintenance release to correct defects	29 d	Wed 4/1	Mon 5/11			65%				
16	Code Freeze of Release 1.6.1	0 d	Mon 5/11	Mon 5/11			0%				
ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998	
					Feb	Mar	Apr	May	Jun	Jul	Aug
17	QA and System test of Release 1.6.1	9 d	Tue 5/12	Fri 5/22				0%			
18	Test Planning	25 d	Mon 2/23	Fri 3/27		100%					
19	Negotiate with Lockheed on required interoperability tests and test process	15 d	Mon 2/23	Fri 3/13		100%					
20	Negotiate with Lockheed on required turn-up tests and test process	15 d	Mon 3/9	Fri 3/27			100%				
21	Develop test plans	20 d	Mon 3/2	Fri 3/27			100%				

ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998	
					Feb	Mar	Apr	May	Jun	Jul	Aug
22	Release Testing	70 d	Mon 2/23	Sat 5/30							63%
23	Accept LNP Release 1.1 - Load Dial-up system and Atlanta & Charlotte Data Center	10 d	Mon 2/23	Fri 3/6							100%
24	Accept LNP Release 1.5 (includes Automation and Recompil of GDMO)	5 d	Wed 4/8	Tue 4/14							100%
25	Release 1.5 loaded on Charlotte Production System	0 d	Tue 4/14	Tue 4/14							100%
26	Accept LNP Release 1.6 (includes all required NANC 1.8 changes)	4 d	Tue 5/12	Fri 5/15							0%
ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 1998	
					Feb	Mar	Apr	May	Jun	Jul	Aug
27	Release 1.6 loaded on Charlotte Production System	0 d	Fri 5/15	Fri 5/15							0%
28	Accept Release 1.6.1 (Maintenance release including correction of Recovery defects)	5 d	Mon 5/25	Fri 5/29							0%
29	Release 1.6.1 loaded on Charlotte Production System	0 d	Sat 5/30	Sat 5/30							0%
30	Certification Testing	88 d	Mon 3/9	Wed 7/8							39%
31	LTI testing with MediaOne - Currently NOT scheduled	2 d	Thu 5/7	Fri 5/8							0%



ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 19	
					Feb	Mar	Apr	May	Jun	Jul	Aug
32	Interoperability Testing - LNP Gateway ( NANC1.1 & Gateway Release 1.1) with DSET(NANC	15 d	Mon 3/9	Fri 3/27		■	100%				
33	Start Turnup Testing in Chicago with Lockheed Release 1.2 and LNP Gateway Release 1.1	7 d	Tue 3/31	Wed 4/8			■	100%			
34	Start Turnup Testing in Chicago with Lockheed Release 1.3 and LNP Gateway Release 1.5	19 d	Wed 4/15	Mon 5/11			■	50%			
35	Turn-up Testing - Certification of LNP Gateway Release 1.6 (and 1.6.1) in Chicago with Lockheed	27 d	Mon 5/18	Tue 6/23				■	0%		
36	Southeast Region SP to SP (paired) testing	3 d	Wed 6/24	Fri 6/26						↓	0%
ID	Task Name	Dur	Start	Finish	1, 1998		Qtr 2, 1998			Qtr 3, 19	
					Feb	Mar	Apr	May	Jun	Jul	Aug
37	Southeast Region Round Robin testing	2 d	Mon 6/29	Tue 6/30						↓	0%
38	Southeast Region DR testing	3 d	Wed 7/1	Fri 7/3						↓	0%
39	Southeast Region Performance testing	3 d	Mon 7/6	Wed 7/8						↓	0%
40	Field Testing	105 d	Mon 3/23	Fri 8/14			■				
41	Generate Run Books for TSC	30 d	Mon 3/23	Fri 5/1		■	90%				